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and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b>In re</b>	<b>: Chapter 11 Case No.</b>
	<b>:</b>
<b>LEHMAN BROTHERS HOLDINGS INC., et al.,</b>	<b>: 08-13555 (SCC)</b>
	<b>:</b>
<b>Debtors.</b>	<b>: (Jointly Administered)</b>
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**CERTIFICATE OF NO OBJECTION  
UNDER 28 U.S.C. § 1746 REGARDING OMNIBUS  
CLAIMS OBJECTION SCHEDULED FOR HEARING ON AUGUST 12, 2014**

TO THE HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures entered on June 17, 2010 [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for the entities in the above-referenced chapter 11 cases (the "Chapter 11

Cases”), filed the following omnibus claims objection (the “Claims Objection”) with the Court for hearing on August 12, 2014:

- (a) Four Hundred Seventy-Third Omnibus Objection to Claims (To Reclassify Claims as General Unsecured Claims) [ECF No. 45005].

2. In accordance with the Second Amended Case Management Order, LBHI established a deadline of August 4, 2014 at 4:00 p.m. (the “Response Deadline”) for parties to object or file responses to the Claims Objection.

3. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

4. The Response Deadline has now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objection have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order, or (b) served on LBHI’s counsel by any of the holders of the claims included in Exhibit 1 to the Order attached hereto (the “Claimants”), which includes only the proofs of claim for which the Claims Objection will be granted.

5. Accordingly, LBHI respectfully requests that the proposed order (the “Order”) granting the Claims Objection annexed hereto as Exhibit A, which, except for certain revisions<sup>1</sup> regarding the scope of the Order, is unmodified since the filing of the Claims

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<sup>1</sup> These revisions have been agreed upon between LBHI and the Claimants and are intended to make clear that the Order shall not affect or impact in any way any claim asserted by the Claimants in the Chapter 11 Cases, other than the claims listed on Exhibit 1 to the Order.

Objection, be entered in accordance with the procedures described in the Second Amended Case Management Order.

I declare that the foregoing is true and correct.

Dated: August 6, 2014  
New York, New York

**CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP**

By: /s/ L. P. Harrison 3rd  
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**EXHIBIT A**

**(Proposed Order – Docket No. 45005)**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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**In re** : **Chapter 11 Case No.**  
 :  
**LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (SCC)**  
 :  
**Debtors.** : **(Jointly Administered)**  
-----X

**ORDER GRANTING THE FOUR HUNDRED  
SEVENTY-THIRD OMNIBUS OBJECTION TO CLAIMS  
(TO RECLASSIFY CLAIMS AS GENERAL UNSECURED CLAIMS)**

Upon the four hundred seventy-third omnibus objection to claims, dated July 3, 2014 (the “Four Hundred Seventy-Third Omnibus Objection to Claims”),<sup>1</sup> of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for certain entities in the above-referenced chapter 11 cases (collectively, the “Chapter 11 Estates”), pursuant to Rule 3007(d) of the Federal Rules of Bankruptcy Procedure and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim (Docket No. 6664) (the “Procedures Order”), seeking to reclassify the Misclassified Claims as general unsecured claims, all as more fully described in the Four Hundred Seventy-Third Omnibus Objection to Claims; and due and proper notice of the Four Hundred Seventy-Third Omnibus Objection to Claims having been provided; and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Four Hundred Seventy-Third Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, and just cause for the relief granted herein is present; and upon the informal objections and reservations of rights set forth herein by

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<sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Four Hundred Seventy-Third Omnibus Objection to Claims.

the holders of the Misclassified Claims (the “Claimants”); and after due deliberation and sufficient cause appearing therefor, it is

ORDERED that the relief requested in the Four Hundred Seventy-Third Omnibus Objection to Claims is granted solely as set forth in this Order; and it is further

ORDERED that the claims listed on Exhibit 1 annexed hereto (collectively, the “Misclassified Claims”) are reclassified as general unsecured claims; and it is further

ORDERED that nothing in this Order shall be construed as allowing the Misclassified Claims; and it is further

ORDERED that this Order has no res judicata, estoppel, law of the case, or other effect on the validity, allowance, or disallowance of any Misclassified Claim (other than the priority of the Misclassified Claims), and all rights to object on any basis are expressly reserved with respect to any Misclassified Claim; and it is further

ORDERED that this Order has no res judicata, estoppel, law of the case, or other effect of any kind on the validity, priority, classification, allowance, or disallowance of any of the Claimants’ proofs of claim against any other Debtors and their Chapter 11 Estates in the above-referenced chapter 11 cases; and it is further

ORDERED that the Debtors’ Court-appointed claims agent is authorized to modify the claims register to reflect this Order; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all matters arising from or related to this Order.

Dated: \_\_\_\_\_, 2014  
New York, New York

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UNITED STATES BANKRUPTCY JUDGE

**EXHIBIT 1**

OMNIBUS OBJECTION 473: EXHIBIT 1 - MISCLASSIFIED CLAIMS

NAME	CLAIM #	FILED DATE	DEBTOR NAME	AMOUNTS					
				ADMINIS-TRATIVE	SECURED	PRIORITY	UNSECURED	EQUITY	TOTAL
1 NEWPORT GLOBAL CREDIT FUND (MASTER) L.P.	29248	9/22/09	LB 2080 Kalakaua Owners LLC						
			TOTAL ASSERTED AMOUNT	Undetermined					Undetermined*
			CLAIM AS MODIFIED				Undetermined		Undetermined*
2 NEWPORT GLOBAL OPPORTUNITIES FUND, LP	26374	9/22/09	LB 2080 Kalakaua Owners LLC						
			TOTAL ASSERTED AMOUNT	Undetermined					Undetermined*
			CLAIM AS MODIFIED				Undetermined		Undetermined*
3 PEP CREDIT INVESTOR LP	26398	9/22/09	LB 2080 Kalakaua Owners LLC						
			TOTAL ASSERTED AMOUNT	Undetermined					Undetermined*
			CLAIM AS MODIFIED				Undetermined		Undetermined*
4 PROVIDENCE EQUITY PARTNERS VI LP	29243	9/22/09	LB 2080 Kalakaua Owners LLC						
			TOTAL ASSERTED AMOUNT	Undetermined					Undetermined*
			CLAIM AS MODIFIED				Undetermined		Undetermined*
5 PROVIDENCE EQUITY PARTNERS VI-A, LP	29231	9/22/09	LB 2080 Kalakaua Owners LLC						
			TOTAL ASSERTED AMOUNT	Undetermined		Undetermined	Undetermined		Undetermined*
			CLAIM AS MODIFIED				Undetermined		Undetermined*
6 PROVIDENCE TMT SPECIAL SITUATIONS FUND LP	29257	9/22/09	LB 2080 Kalakaua Owners LLC						
			TOTAL ASSERTED AMOUNT	Undetermined					Undetermined*
							Undetermined		Undetermined*
			TOTAL ASSERTED	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
			TOTAL NOT SUBJECT TO OBJECTION	0.00	0.00	0.00	0.00	0.00	0.00
			TOTAL SUBJECT TO OBJECTION	0.00	0.00	0.00	0.00	0.00	0.00
			TOTAL CLAIM AS MODIFIED	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

\* - Indicates claim contains unliquidated and/or undetermined amounts